

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

TEXAS ASSOCIATION FOR MONEY SERVICES BUSINESSES (TAMSB); HIGH VALUE, INC.; REYNOSA CASA DE CAMBIO, INC.; NYDIA REGALADO d/b/a BEST RATE EXCHANGE; MARIO REGALADO d/b/a BORDER INTERNATIONAL SERVICES; LAREDO INSURANCE SERVICES, LLC; E.MEX. FINANCIAL SERVICES, INC.; R & C, INC. d/b/a TEMEX MONEY EXCHANGE; SAN ISIDRO MULTI SERVICES, INC.; CRIS WIN INC. d/b/a BROWNSVILLE CASA DE CAMBIO; ESPRO INVESTMENT LLC d/b/a LONESTAR MONEY EXCHANGE; and ARNOLDO GONZALEZ, Jr.,

*Plaintiffs,*

v.

PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES; SCOTT BESENT, SECRETARY OF THE TREASURY; UNITED STATES DEPARTMENT OF THE TREASURY; ANDREA GACKI, DIRECTOR OF THE FINANCIAL CRIMES ENFORCEMENT NETWORK; and FINANCIAL CRIMES ENFORCEMENT NETWORK,

*Defendants.*

Civil Case No. 5:25-cv-00344-FB

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DECLARATION OF ELIZABETH L. SANZ

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I, Elizabeth L. Sanz, declare under penalty of perjury under the laws of the State of Texas and pursuant to 28 U.S.C. § 1746(2) that the following is true:

1. I am a citizen of the United States and over eighteen years of age. I make this statement based on my personal knowledge of the facts set forth below.

2. I am an active member of the State Bar of California in good standing. I am an attorney with the Institute for Justice, which represents Plaintiff High Value, Inc. and Arnaldo Gonzalez, Jr. in the above-captioned action, and I submit this declaration in support of Plaintiffs' Motion for a Preliminary Injunction.

3. All references to "FinCEN" in this declaration are to the Financial Crimes Enforcement Network, an agency of the United States Department of the Treasury.

4. This case concerns FinCEN's *Issuance of a Geographic Targeting Order Imposing Additional Recordkeeping and Reporting Requirements on Certain Money Services Businesses Along the Southwest Border*, 90 Fed. Reg. 12106 (Mar. 14, 2025). This is the order that Plaintiffs refer to as the "Border GTO."

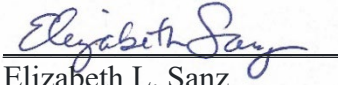
5. Exhibit A is a true and correct copy of a visual map-style representation of the Texas zip codes that are included in the Border GTO. The Border-GTO-affected zip codes are shaded in purple. This map was prepared by me, using an application that sources information from Google.

6. Attached as Exhibit B is a true and correct copy of a visual map-style representation of the California zip codes that are included in the Border GTO. The Border-GTO-affected zip codes are shaded in purple. This map was prepared by me, using an application that sources information from Google.

7. Attached as Exhibit C is a true and correct copy of a visual map-style representation of all zip codes that are included in the Border GTO. The Border-GTO-affected zip codes are shaded in purple. This map was prepared by me, using an application that sources information from Google.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED and SIGNED this 18th day of April, 2025.



Elizabeth L. Sanz